



June 17, 2021

VIA ECF

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. David Wagner, et. al., 19-cr-437 (AKH)

Your Honor:

I am one of the lawyers representing defendant Marc Lawrence in this case. I write to respectfully request that the Court approve Mr. Lawrence's travel to Eugene, Oregon on June 23rd to re-join his girlfriend and her daughter.

As part of the conditions of release that the Court set for Mr. Lawrence on June 26, 2019, his travel was restricted to the State of Florida and the Southern and Eastern Districts of New York. (Docket No. 8). Following his sentencing on June 9, 2021, these conditions of release were continued. Mr. Lawrence seeks to travel to Eugene, Oregon by plane, departing from Orlando, Florida on Wednesday, June 23rd. He will return to Orlando on July 4th.

Neither the government (AUSA Sagar Ravi) nor Pretrial Services (USPSO Anthony Zarate) objects to this request.

Sincerely,

/s/ Michelle Fox

cc: AUSA Jilan Kamal, Esq. (by ECF)
AUSA Sagar Ravi, Esq. (by ECF)